Filed 07/28/25

#:1825

Page 1 of 3 Page ID

Case 5:24-cv-01336-JGB-DTB Document 68

Case 5:24-cv-01336-JGB-DTB	Document 68	Filed 07/28/25	Page 2 of 3	Page II
	#:1826			

August 4, 2025 at 9:00 am. The Parties' "Stipulation to Continue Hearing Date on Motion to Intervene," ECF No. 60, is currently pending before the Court, and if granted would continue the hearing to September 15, 2025.

If the Court does not grant the stipulation, good cause exists to allow undersigned counsel for Defendants to appear remotely. Counsel for Defendants are both located in Albuquerque, New Mexico. Defendants' counsel, Mr. Smith, is scheduled for a medical appointment in Albuquerque on August 4. Defendants' counsel, Ms. Hamilton, has commitments in Albuquerque that would make appearing in person at an August 4 hearing difficult. Thus, if the Court does not grant the stipulation and continue the hearing to September 15, 2025, Defendants respectfully request that the Court allow undersigned counsel to appear remotely. A proposed order granting this request is attached.

Respectfully submitted on July 28, 2025.

ADAM R.F. GUSTAFSON

Acting Assistant Attorney General
Environment and Natural Resources Division
United States Department of Justice

/s/ Emma L. Hamilton

EMMA L. HAMILTON
Trial Attorney
ANDREW A. SMITH
Senior Trial Attorney
Natural Resources Section
c/o United States Attorney's Office
201 Third Street, N.W., Suite 900
Albuquerque, New Mexico 87102
andrew.smith@usdoj.gov

Attorneys for Defendants

Case 5:24-cv-01336-JGB-DTB Document 68 Filed 07/28/25 Page 3 of 3 Page ID #:1827

CERTIFICATE OF SERVICE

I hereby certify that on July 28, 2025, I electronically filed the foregoing document with the Clerk of Court using the CM/ECF system, which will automatically send email notification to the attorneys of record.

/s/ Emma L. Hamilton Emma L. Hamilton U.S. Department of Justice